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14 UNITED STATES OF AMERICA

15 UNITED STATES DISTRICT COURT
16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,) No. CV 11-3582-GW-SS
18 Plaintiff,)
19 v.) Consolidated With CV 13-9169-GW-SS
20)
21 ONE WHITE CRYSTAL-COVERED “BAD)
TOUR” GLOVE AND OTHER MICHAEL) **JOINT STATUS REPORT REGARDING**
22 JACKSON MEMORABILIA;) **SETTLEMENT AND JOINT MOTION**
23 REAL PROPERTY LOCATED ON) **AND STIPULATION TO CONTINUE**
SWEETWATER MESA ROAD IN MALIBU,) **STATUS CONFERENCE**
24 CALIFORNIA; ONE 2011 FERRARI 599)
GTO,)
25 Defendants.)
26)

1 On July 18, 2014, the United States and Teodoro Nguema Obiang Mangue
2 and Sweetwater Malibu, LLC (“Claimants”) filed a Notice of Settlement and Joint
3 Motion to Stay Proceedings and Vacate Scheduled Dates (the “Joint Motion”).
4 ECF No. 118. The parties advised the Court that they had reached a tentative
5 agreement resolving the above-identified cases in their entirety. Id. The parties
6 further apprised the Court that “[f]inal settlement is contingent upon counsel for
7 the United States obtaining necessary internal approvals” within the Department
8 of Justice (the “Department”), and that counsel for the United States would
9 endeavor to complete the process for obtaining these approvals within thirty (30)
10 days or less. Id. Accordingly, the parties requested that the Court stay
11 proceedings and vacate the scheduled dates in the above-identified actions.
12

13 On July 28, 2014, this Court entered an order staying proceedings, vacating
14 the scheduled dates in the above-identified cases, and instructing the parties to
15 lodge an order resolving the above-referenced cases by no later than August 15,
16 2014, or to file a joint status report. ECF. No. 119.
17

18 On August 12, 2014, the parties filed a Joint Status Report Regarding
19 Settlement and Joint Motion to Continue Status Conference. ECF No. 120. In
20 that joint motion, counsel for the Government advised the Court that the process
21 for obtaining internal approvals within the Department was unexpectedly delayed
22

1 because of the absence of certain supervisory personnel between July and August
2 2014.

3 On August 13, 2014, this Court granted the parties joint motion and
4 directed the parties to lodge an order resolving the above-referenced cases by no
5 later than August 15, 2014, or to file a joint status report. ECF. No. 121. The
6 Court further set a status conference for September 18, 2014. Id.

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9 On September 11, 2014, counsel for the United States obtained the requisite
10 internal approvals to execute the settlement agreement resolving the above-
11 identified actions consistent with the Department's internal policies and
12 procedures. Because obtaining the signature of Claimant for the proposed
13 settlement agreement required counsel to travel overseas, the parties requested
14 that the Court (i) set a deadline of October 6, 2014, for the lodging of a proposed
15 order resolving the matter or the filing of a joint status report, and (ii) continue the
16 status conference scheduled for September 18, 2014 to October 16, 2014 at 8:30
17 A.M. ECF. No. 122.

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19
20 On September 15, 2014, this Court granted the parties joint motion and
21 directed the parties to lodge an order resolving the above-referenced cases by no
22 later than October 6, 2014, or to file a joint status report. ECF. No. 123. The
23 Court further set a status conference for October 16, 2014. Id.

1 Due to the Air France strike in September and October, counsel for
2 Claimant experienced significant and unexpected delays in travelling overseas to
3 obtain Claimant's signature. Counsel for Claimant and counsel for the United
4 States are in the process of finalizing the procedural details of the proposed
5 settlement, and intend to lodge with the Court a copy of the executed settlement
6 agreement by October 10, 2014. Therefore, the parties request that the Court (i)
7 set a deadline of October 13, 2014, for the lodging of a proposed order
8 effectuating the settlement agreement or the filing of a joint status report, and (ii)
9 continue the status conference scheduled for October 16, 2014, to October 20,
10 2014, at 8:30 A.M.
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14

15 Respectfully submitted,

16 DATED: October 6, 2014

17 JAIKUMAR RAMASWAMY, CHIEF
18 ASSET FORFEITURE AND MONEY
LAUNDERING SECTION, Criminal Division

19 s/Woo S. Lee

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UNITED STATES OF AMERICA

DATED: October 6, 2014

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